

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION
NO. 04-11578PBS

FIREMAN'S FUND INSURANCE
COMPANY
As Subrogee of Hodan Properties, Inc.

Plaintiff,
vs.

FIRE SYSTEMS, INC.,
FIRE SUPPRESSION SYSTEMS OF
NEW ENGLAND, INC.,
PRO CON, INC., and
BRIERE & PAQUETTE, INC. f/k/a
PAQUETTE ELECTRIC CO, INC.

Defendants

**DEFENDANT FIRE SUPPRESSION SYSTEMS OF NEW
ENGLAND, INC.'S AUTOMATIC DISCLOSURE**

Pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(A), the defendant, Fire Suppression Systems of New England, Inc. (hereinafter "FSS"), makes the following automatic disclosure:

I. Individuals Likely to Have Discoverable Information

1. The plaintiff;
2. All named defendants;
3. Charles W. Barrett, Fire Systems, Inc.;
4. Tom Klem;
5. Dartmouth Fire Chief McNamara;
6. Christopher Paquin, Project Manager, FSS;
7. William Roland, Marriott Residence Inn;

8. Corey Rogers, Fire Systems, Inc.;
9. Richard R. Pepetti;
10. Those individuals identified in Plaintiff's Automatic Disclosure;
11. Tom O'Connor, FSS;
12. Paul Bolermo, FSS;
13. Charlie Higgins;
14. Scott and Bill of TEC Control Systems, Inc.;
15. Dave LaFlame, Paquette Electric;
16. L.B., FSS;
17. Jessie M of FSS;
18. Clint of FSS; and
19. Kurt LaFlame, Paquette Electric.

FSS will supplement this list as additional names of individuals become known.

II. Documents That Are Potentially Relevant to the Proceedings

1. Approved Drawings of Sprinkler Piping
2. As Built Drawings of Sprinkler Piping
3. Contractor's Material and Test Certificate for Underground Piping
4. Contractor's Material and Test Certificate for Aboveground Piping
5. 03/10/03 Claim Letter from Craig/is Ltd.
6. Subcontract between ProCon and FSS
7. 1/19-23/03 FSS Work Orders
8. Alarm History Print Out
9. TEC Control Systems, Inc. Certificate of Completion
10. Multiplex Fire Alarm System Test and Inspection dated 1/23/03
11. T.J. Klem & Ass, 11/23/03 Report
12. 11/13/03 Letter from Papetti to Klem
13. 04/28/03 Report from Papetti
14. Water Flow Test Report
15. FSS Job Quotation
16. 8/21/01 Specification Sheet
17. Voluminous misc. FSS job related records, manufacturer's materials, etc.

III. Insurance Agreements

Available upon request.

The defendant,

Fire Suppression Systems of
New England, Inc.
By its attorneys,

/s/Jocelyn M. Sedney

Jocelyn M. Sedney, BBO# 552115
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Dated: January 6, 2005